

BEFORE THE INSURANCE COMMISSIONER

FOR THE STATE OF DELAWARE

IN THE MATTER OF:

LOUIS DELUCA; GARY L. KARNS, JR. ;  
ASSOCIATION OF INDEPENDENT :  
MANAGERS; INTEGRATED INSURANCE :  
MARKETING, INC. (d/b/a AIM HEALTH :  
PLANS, INC.); INSURANCE RESOURCE :  
GROUP; ARNOLD H. KATZ; VENTURE :  
SUPPORT GROUP, LLC; JOSEPH MANCUSO; :  
CEO CLUBS, INC. :  
(a/k/a CEO CLUB or CEO CLUBS) :  
KEVIN R.DUNN; RICHARD DUNN; :  
HUDSON VALLEY CONSULTANTS, LLC : Docket No. 1381-2010  
(d/b/a CEO CLUB BENEFITS); :  
METROPOLITAN BUSINESS ALLIANCE, LLC :  
(d/b/a NATIONAL ASSOCIATION :  
OF BUSINESS LEADERSHIP, LLC.); :  
WILLIAM WORTHY II; :  
COLIN JACK YOEUELL; :  
BEEMA-PAKISTAN COMPANY; :  
SERVE AMERICA ASSURANCE, :  
STAR GROUP/PHOENIX INSURANCE :  
COMPANY; SOUTHEAST INSURANCE :  
ADVISORS, LLC; DAVID L.CLARK; :  
RBA ADMINISTRATORS; :  
KATHLEEN D.CAUTHEN, ESQUIRE; :  
WILSHIRE HOLDING, LLC; :  
VIKING ADMINISTRATORS, LLC; :  
WORLD WIDE FAMILY BENEFITS ASSOCIATION, :  
INC. ; :  
DAVID NELSON; :  
UNITED STATES CONTRACTORS TRUST; :  
UNITED STATES CONTRACTORS ASSOCIATION :

RESPONDENTS

## **CEASE AND DESIST ORDER**

**WHEREAS**, Louis Deluca (DELUCA) lives and/or works in Valhalla, New York., he is not licensed by the Delaware Department of Insurance in any capacity and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, Utah, South Carolina, North Carolina, Oklahoma, and Florida;

**WHEREAS**, Gary L.Karns (KARNS) lives and/or works in Akron, Ohio, was licensed by the Delaware Department of Insurance in March of 2010 as a Non Resident Producer in Health and Life, and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, Utah, South Carolina, North Carolina, Oklahoma, and Florida;

**WHEREAS**, Association of Independent Managers (AIM) is a foreign corporation with a principal place of business at 20 Madison Avenue, Valhalla, New York 10595;

**WHEREAS**, Integrated Insurance Marketing, Inc. (INTEGRATED) is a foreign corporation with a principal place of business at 1618 Boettler Road, Uniontown, Ohio, 44685;

**WHEREAS**, Deluca and Karns formed the Association of Independent Managers (AIM) and Integrated Insurance Marketing, Inc. (Integrated) for the purpose of marketing, offering and providing limited health insurance plans, and Deluca is not

licensed as an insurance representative of any type in Delaware, and Karns is not appointed to offer the insurance products in Delaware that AIM sold to Delaware consumers;

**WHEREAS**, Deluca, Karns, AIM and Integrated marketed, offered and provided limited health insurance benefit plans (“AIM Health Plans”) in the State of Delaware to at least 100 residents of the State of Delaware;

**WHEREAS**, Insurance Resource Group, Inc. (IRG) is a foreign corporation with a principal place of business at 20 Madison Avenue, Valhalla, New York 10595, and is owned and controlled by Deluca;

**WHEREAS**, IRG is not, and never has been, authorized to engage in the transaction of insurance in the State of Delaware and entered into an arrangement with CEO Club to collect premiums and administer limited health insurance benefit policies for members of the CEO Club/ AIM, and IRG has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, North Carolina, South Carolina, Utah, Oklahoma, and Florida;

**WHEREAS**, Arnold H. Katz (KATZ) lives and/or works in Solana Beach, California, he is not licensed by the Delaware Department of Insurance in any capacity and has been named in a cease and desist order, relating to activities that are the subject of this order, issued by the insurance regulatory agencies in North Carolina, and Oklahoma;

**WHEREAS**, Venture Support Group, LLC ( VENTURE) is a foreign corporation, owned by Katz , with a principal place of business at 169 Saxony Road #204, Encinitas, California 92023 is not, and never has been, authorized to engage in the

transaction of insurance in Delaware, is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code, and Katz through Venture marketed and sold CEO Club /NABL memberships with health insurance benefits that were underwritten by the bogus Phoenix Insurance Company, and has been named in a cease and desist orders, relating to activities that are the subject of this order, issued by the insurance regulatory agency in North Carolina;

**WHEREAS**, Joseph Mancuso ( MANCUSO) lives and/or works in New York, New York, he is not licensed by the Delaware Department of Insurance in any capacity and has been named in a cease and desist order, relating to activities that are the subject of this order, issued by the insurance regulatory agency in North Carolina;

**WHEREAS**, CEO Clubs, Inc. (CEO CLUB) is a membership organization, managed by Mancuso, with a principal place of business located at 15 Broad St. Suite 1120, New York, New York 10005, and does business as Chief Executive Officers Club, Inc., CEO Club, and CEO Clubs, and is comprised of local clubs and chapters that provides benefits, including health insurance benefits, through association memberships available to the public for a fee via their website.

**WHEREAS**, CEO Club is not, and never has been, authorized to engage in the transaction of insurance in the State of Delaware and entered into an arrangement with IRG to administer limited health insurance benefit policies for members of the CEO Club, and CEO Club and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, North Carolina, South Carolina, Utah, Oklahoma, and Florida;

**WHEREAS**, Kevin R. Dunn (K. DUNN) lives and/or works in Montville, New Jersey, he is not licensed by the Delaware Department of Insurance in any capacity and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in North Carolina, Texas, and Florida;

**WHEREAS**, Richard Dunn ( R. DUNN) lives and/or works in Hopewell Junction , New York, he is not licensed by the Delaware Department of Insurance in any capacity and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in North Carolina, Texas, and Florida;

**WHEREAS**, Hudson Valley Consultants ,LLC ( HUDSON VALLEY) is a foreign corporation with a principal place of business at 100 Eagle Rock Avenue, East Hanover, New Jersey 07936, and is a consulting organization that develops and provides resources, including health insurance benefits, to members of CEO Club, but is not exempt from the provisions of the Delaware insurance code, and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, North Carolina, and Florida;

**WHEREAS**, Kevin R. Dunn is the managing director of Hudson Valley and Richard Dunn is a consultant to Hudson Valley doing business as CEO Club Benefits, and neither Kevin R. Dunn nor Richard Dunn are licensed to engage in the transaction of insurance in the state of Delaware; are not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code; but offered or provided

health insurance benefits to residents of Delaware who were members of the CEO Club;

**WHEREAS**, Metropolitan Business Alliance, is a foreign corporation with an address C/O National Registered Agents, Inc. 120 Penmarc Drive, Raleigh, North Carolina 27603 and does business as National Association of Business Leadership, LLC (NABL) with an address C/O National Registered Agents, Inc., 875 Avenue of the Americas, Suite 501 New York, New York 10001, and Kevin and Richard Dunn are owners of the National Association of Business Leadership, LLC (NABL) and through marketing entities solicited members of American Trade Association and Real Benefits Association to purchase health insurance with NABL, and NABL is not authorized to engage in the transaction of insurance in the state of Delaware; is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code; and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, North Carolina, South Carolina, and Florida;

**WHEREAS**, William Worthy II ( WORTHY) lives and/or works in Isle of Palms, South Carolina , is not licensed by the Delaware Department of Insurance in any capacity and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, South Carolina, North Carolina, Oklahoma, and Florida, and was named in a prior Cease and Desist Order in Delaware in April of 2010 regarding his unauthorized insurance activity relating to Serve America Assurance and Beema – Pakistan Company Limited, and has continued to engage in unauthorized insurance activity;

**WHEREAS**, Colin Jack Youell ( YOUELL) lives and/or works in West Palm Beach, Florida , is not licensed by the Delaware Department of Insurance in any capacity and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, Oklahoma, and North Carolina, and was named in a Cease a Desist Order in Delaware regarding his unauthorized insurance activity relating to Serve America Assurance and Beema – Pakistan Company Limited;

**WHEREAS**, Beema Pakistan Company, Ltd (BEEMA) is a foreign corporation with an address of 412-2-427 4<sup>th</sup> Floor, Karachi, Pakistan 7400, Pakistan, that offers and provides insurance products and is not, and never has been, authorized to engage in the transaction of insurance in the state of Delaware; is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code; but offered or provided health insurance benefits to residents of Delaware through AIM; and Colin Jack Youell is identified as an officer in Beema, and Serve America Assurance (SERVE AMERICA) is purported to be a wholly-owned offshore, captive insurance company of BEEMA; is not, and never has been, authorized to engage in the transaction of insurance in the state of Delaware; is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code; but issued health insurance policies in the state of Delaware that were written by BEEMA, and BEEMA and SERVE AMERICA have been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, North Carolina, and South Carolina, Oklahoma, and was named in a prior Cease a Desist Order in Delaware in April of 2010 regarding unauthorized insurance activity;

**WHEREAS**, Star Group U.K/Phoenix Insurance Company ( STAR GROUP) is a foreign corporation located at 29 West End Road , Southall,England UB11JQ that offers and provides insurance products, but is not, and never has been, authorized to engage in the transaction of insurance in Delaware, is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code; but offered or provided through William Worthy II and David Clark health insurance benefits to residents of Delaware who were members of the CEO Club, and misrepresented the company as Phoenix Insurance NAIC # 25623 which is a subsidiary of The Travelers Group, a licensed Delaware insurer;

**WHEREAS**, Southeast Insurance Advisors, LLC ( SOUTHEAST ) is a Delaware limited liability company with a mailing address of P.O.Box 462, Isle of Palms, South Carolina 29451, and is owned , and/or controlled by William Worthy II, and never has been authorized to engage in the transaction of insurance in Delaware, is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code, and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, South Carolina, and Oklahoma;

**WHEREAS**, David L. Clark ( CLARK) lives and/or works in Basking Ridge , New Jersey, is not licensed by the Delaware Department of Insurance in any capacity and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, South Carolina, North Carolina, Oklahoma, and Florida, and was named in a prior Cease a Desist Order in Delaware in April 2010 regarding his unauthorized insurance activity relating to Real Benefits



Association and American Trade Association, and has continued to engage in unauthorized insurance activity;

**WHEREAS**, RBA Administrators (RBAA) is a foreign corporation with a principal place of business at 118 A Fulton Street, Post Office Box 138, New York, New York 10038 and P.O.Box 74 Basking Ridge, New jersey 07920, and is owned and controlled by David L. Clark, and never has been authorized to engage in the transaction of insurance in Delaware, is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code, and Clark through RBAA has acted as the Third Party Administrator for members of CEO/AIM health benefits plans purchased by Delaware consumers, and has been named in a cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in North Carolina; South Carolina, and Texas, and was named in a Cease a Desist Order in Delaware in April of 2010 regarding unauthorized insurance activity;

**WHEREAS**, Kathleen D. Cauthen, Esquire ( CAUTHEN) lives and/or works in Blythewood, South Carolina , is not licensed by the Delaware Department of Insurance in any capacity and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, South Carolina, Oklahoma, and North Carolina;

**WHEREAS**, Wilshire Holding, LLC (WILSHIRE) is a foreign corporation with a business address of 10120 Two Notch Road #2-340, Columbia, South Carolina 29223 is not, and never has been, authorized to engage in the transaction of insurance in Delaware, is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code; and was set up and controlled by Cauthen

and Worthy for the purpose of administering CEO/NABL medical insurance benefits plans through alleged agreements with World Wide Family Benefits Association, Inc (WWFBA) and United States contractors Trust ( USCT), and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, North Carolina, South Carolina, Oklahoma, and Florida;

**WHEREAS**, Viking Administrators ,LLC ( VIKING) is a foreign corporation with an address of Post Office Box 611, Blythewood, south Carolina 29016 and C/Northwest Registered Agent, Inc. 7176Forrest Oaks Drive, Nashville, Tennessee 29016, but is not, and never has been, authorized to engage in the transaction of insurance in Delaware, is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code; but acted as an administrator for CEO Clubs and Real Benefits Association for health insurance benefits sold to Delaware members, and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, North Carolina, South Carolina, Oklahoma, and Florida;

**WHEREAS**, World Wide Family Benefits Association, Inc (WWFBA) is a foreign corporation with a principal place of business at 8655 East Via De Ventura #6200, Scottsdale, Arizona 85258, and is a membership based association that provides benefits, including health insurance benefits, through its association memberships, and never has been authorized to engage in the transaction of insurance in Delaware, is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code; and offered and provided AIM Health Plans to residents of

Delaware, and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, North Carolina, South Carolina, Oklahoma, and Florida;

**WHEREAS**, David Nelson (a/k/a Davis Nelson and David Nellson) lives and/or works in West Palm Beach, Florida, is not licensed by the Delaware Department of Insurance in any capacity and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in Texas, North Carolina, Oklahoma, and South Carolina;

**WHEREAS**, United States Contractors Trust (USCT) is a Delaware statutory trust with a business address C/O Resident Limited 111 Barksdale Professional Center Newark, Delaware and lists Respondent Nelson as the senior trustee, and never has been authorized to engage in the transaction of insurance in Delaware, is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code; and WORTHY and CLARK represented to CEO Clubs that USCT was a risk retention group and the underwriter for Phoenix Insurance, and has been named in cease and desist orders, relating to activities that are the subject of this order, issued by insurance regulatory agencies in North Carolina; South Carolina, Oklahoma, and Texas;

**WHEREAS**, United States Contractors Association (USCA) is a Delaware corporation with a business address C/O Business Filings Incorporated, 108 West 13<sup>th</sup> St., Wilmington, Delaware 19801 and lists David Nelson as the president, and never has been authorized to engage in the transaction of insurance in Delaware, is not exempt under any provision, either state or federal, from the requirements of the Delaware Insurance Code; and WORTHY represented to CEO Clubs that USCA was a risk

retention group domiciled in Delaware and licensed in 40 states , and has been named in a cease and desist order, relating to activities that are the subject of this order, issued by insurance regulatory agencies of North Carolina, and Oklahoma;

**WHEREAS**, DELUCA; KARNS; ASSOCIATION OF INDEPENDENT MANAGERS; INTEGRATED INSURANCE MARKETING, INC; INSURANCE RESOURCE GROUP; KATZ; VENTURE SUPPORT GROUP, LLC; MANCUSO; CEO CLUBS, INC.; K. DUNN; R.DUNN; HUDSON VALLEY CONSULTANTS,LLC; METROPOLITAN BUSINESS ALLIANCE,LLC.; NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC; WORTHY; YOUELL; BEEMA-PAKISTAN COMPANY LIMITED; SERVE AMERICA ASSURANCE,LTD; STAR GROUP/POENIX INSURANCE COMPANY; SOUTHEAST INSURANCE ADVISORS, LLC; CLARK; RBA ADMINISTRATORS; CAUTHEN; WILSHIRE HOLDING,LLC; VIKING ADMINISTRATORS, LLC; WORLD WIDE FAMILY BENEFITS ASSOCIATION, INC.; NELSON; UNITED STATES CONTRACTORS TRUST; UNITED STATES CONTRACTORS ASSOCIATION; together and collectively are all the Respondents (“RESPONDENTS”) in this Order;

**WHEREAS**, Respondents are jointly and severally in violation of any or all of 18 *Del. C.* §§ 1703 and 2101 and, therefore, subject to such sanctions and penalties as may be imposed under Delaware law, including, but not limited to, 18 *Del. C.* §§ 106, 329, 2111, and 2308; and

**WHEREAS**, it is in the best interest of the citizens of the State of Delaware that the Delaware Department of Insurance (the “Department”) enter a cease and desist order to assure that the Respondents jointly and severally comply with Delaware law, take such

actions to refund payments made to any or all of the Respondents obtained from its or their solicitation in Delaware, and to seek such other penalties as are appropriate to terminate the wrongful conduct of the Respondents. Further, the Respondents are hereby notified that the Commissioner reserves all rights to investigate the individual actions of the principals, officers, and agents of respondents and its related entities and seek any additional remedies available under the law including; but not limited to, civil penalties on Respondents and related entities or individuals.

**THEREFORE, EFFECTIVE THIS 19<sup>th</sup> DAY OF AUGUST 2010, IT IS  
ORDERED AS FOLLOWS:**

1. Respondents and all their employees, officers, directors, agents, or by or through any person acting on their behalf shall immediately cease and desist from all activities in the State of Delaware, including soliciting, marketing, or proposing to make any insurance contract, taking, receiving, or forwarding any application for insurance, collecting or receiving, in full or in part, any insurance premium or fees, issuing or delivering any insurance policy or other evidence of an insurance contract, publishing or disseminating any advertisement or information for insurance, or representing or assisting any person to provide unauthorized insurance or to procure insurance from an unauthorized insurer.


2. Respondents, jointly and severally, shall notify all persons, firms, or entities marketing, selling, or distributing materials or the like on their benefit in Delaware to cease and desist from all such activities and shall within 10 days provide written confirmation to the Department of the persons, firms, or entities so noticed along with a copy of said notice.

3. Respondents shall jointly and severally (i) promptly pay any claims for benefits made by residents of the State of Delaware payable under the terms of the health plans sold by Respondents to said Delaware residents; (ii) within 30 days, offer every Delaware resident to whom a membership has been extended the right to cancel that membership; (iii) within 45 days, refund to any person choosing to cancel his or her membership all moneys, including, but not limited to, all unearned premiums and enrollment fees collected directly or indirectly from said person(s) in connection with their membership, and (iv) provide written confirmation to the Department within 60 days of all payments, refunds, and membership cancellations in connection with items (i), (ii) and (iii) above.

4. Within 180 days, the Respondents jointly and severally shall cancel every membership extended to any Delaware resident and refund to each such person all moneys, including, but not limited to, all unearned premiums and enrollment fees, collected directly or indirectly from said person(s).

DATED this 19 day of AUGUST, 2010.

KAREN WELDIN STEWART, CIR-ML  
DELAWARE INSURANCE COMMISSIONER



### CERTIFICATE OF MAILING

I do hereby certify that on this date I mailed, by regular and certified mail, postage prepaid a true and correct copy of the attached CEASE AND DESIST ORDER to the following:

WILLIAM WORTHY II  
44 Morgan Place Dr.  
Isle of Palms, SC 29451  
And  
117 Winding Oak Way  
Blythewood, South Carolina 29016

ASSOCIATION OF INDEPENDENT  
MANAGERS.  
20 Madison Avenue  
Valhalla, New York 10595

COLIN JACK YOEELL  
1551 N. Flagler  
West Palm Beach, Florida 33401

LOUIS DELUCA  
1106 Smith Ridge Road  
New Canaan, CT 06840

BEEMA-PAKISTAN COMPANY  
LIMITED  
412-427, 4th Floor  
Muhammadi House  
I.I. Chundrigar Road  
Post Office Box 5626  
Karachi-74000, Pakistan  
SERVE AMERICA ASSURANCE, LTD.  
412-24274<sup>th</sup> Floor  
Karachi, Pakistan 7400 Pakistan

GARY L. KARNS, JR.  
3465 Arlington Road, # E154  
Akron, Ohio 44312-5272

INTEGRATED INSURANCE  
MARKETING  
c/o Gary L. Karns, Jr.  
1618 Boettler Rd.  
Uniontown, Ohio 44685

STARR GROUP/PHOENIX INSURANCE  
c/o William Worthy II  
44 Morgan Place Dr.  
Isle of Palms, SC 29451

INSURANCE RESOURCE GROUP  
20 Madison Avenue  
Valhalla, New York 10595

SOUTHEAST INSURANCE ADVISORS,  
LLC  
P.O.Box 462  
Isle of Palms, SC 29451

ARNOLD KATZ  
731 South Highway 101, #2E  
Solana Beach, CA 92075

DAVID L. CLARK,  
118 A Fulton Street  
Post Office Box 138  
New York, New York 100

VENTURE SUPPORT GROUP  
169 Saxony Road #204  
Encinitas, CA 92024

REAL BENEFITS ADMINISTRATORS  
118 A Fulton Street  
Post Office Box 138  
New York, New York 10038

CEO CLUBS, INC.  
15 Broad Street Suite 1120  
New York, New York 10005-1972

KATHLEEN D. CAUTHEN  
117 Winding Oak Way  
Blythewood, South Carolina 29016

JOSEPH MANCUSO  
15 Broad Street Suite 1120  
New York, New York 10005-1972

WILSHIRE HOLDINGS, LLC  
c/o Kathleen D. Cauthen  
117 Winding Oak Way  
Blythewood, South Carolina 29016

KEVIN R. DUNN  
2 Changebridge Road  
West Building Suite 203  
Montville, New Jersey 07045

VIKING ADMINISTRATORS, LLC  
c/o Northwest Registered Agent, Inc.  
7176 Forrest Oaks Drive  
Nashville, TN 37221

RICHARD DUNN  
14 Fairview Road  
Hopewell Junction, New York 12533



WORLDWIDE FAMILY BENEFITS  
ASSOCIATION, INC.  
c/o Corporate Creations Network  
8275 South Eastern Avenue #200  
Las Vegas, Nevada 89123

HUDSON VALLEY CONSULTANTS,  
LLC  
2 Changebridge Road  
West Building Suite 203  
Montville, New Jersey 07045

DAVID NELSON  
855 Wolf Street  
Baltimore, MD 21205

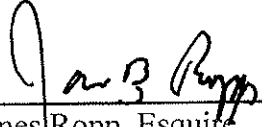
METROPOLITAN BUSINESS  
ALLIANCE, LLC  
c/o National Registered Agents, Inc.  
120 Penmarc Drive  
Raleigh, NC 27603

UNITED STATES CONTRACTORS  
TRUST  
c/o Resident Limited  
111 Barksdale Professional Center  
Newark, DE 19711

NATIONAL ASSOCIATION OF  
BUSINESS LEADERSHIP, LLC  
c/o National Registered Agents, Inc.  
875 Avenue of the Americas, Suite 501  
New York, New York 10001

UNITED STATES CONTRACTORS  
ASSOCIATION  
c/o Business Filings Incorporated  
108 West 13<sup>th</sup> Street  
Wilmington, DE 19801

DATED this 23 day of August, 2010

  
\_\_\_\_\_  
James Ropp, Esquire  
Delaware Department of Justice  
On behalf of the Delaware Department of  
Insurance